## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

MOOG, INC.,

Plaintiff,

Civil Action No. 1:22-cv-00187-LJV-JJM

v.

SKYRYSE, INC., ROBERT ALIN PILKINGTON, MISOOK KIM, and DOES NOS. 1-50.

Defendants.

## **NOTICE OF MOTION TO SEAL**

PLEASE TAKE NOTICE that Defendant Skyryse, Inc. respectfully submits this motion for an order to file under seal Exhibit A to the Declaration of Arman Zahoory in Support of Skyryse's November 7, 2022 letter to Judge McCarthy.

Exhibit A is a letter sent by counsel for Moog on November 2, 2022 which counsel for Moog has designated as "Highly Confidential – Attorneys' Eyes Only." In accordance with Moog's confidentiality designation, Skyryse requests that Exhibit A be sealed.

Dated: November 7, 2022 By: /s/ Gabriel S. Gross

## LATHAM & WATKINS LLP

Douglas E. Lumish (Admitted *Pro Hac Vice*) Gabriel S. Gross 140 Scott Drive Menlo Park, California 94025 Telephone: (650) 328-4600

Facsimile: (650) 463-2600 Email: doug.lumish@lw.com gabe.gross@lw.com Joseph H. Lee (Admitted *Pro Hac Vice*) 650 Town Center Drive, 20<sup>th</sup> Floor Costa Mesa, California 92626 Telephone: (714) 540-1235 Facsimile: 714-755-8290

Email: joseph.lee@lw.com

and

## HARRIS BEACH PLLC

Terrance P. Flynn 726 Exchange Street, Suite 1000 Buffalo, New York 14210 Telephone: (716) 200-5050 Email: tflynn@harrisbeach.com